

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MOTION TO RECONSIDER CONDITIONS OF RELEASE

Defendant Naomi Watford hereby requests the court reconsider conditions of pretrial release, specifically to allow her to be released without a requirement that she be required to wear a bracelet. This change is sought in order to allow her the flexibility needed to take advantage of certain work and educational opportunities. A review of her record suggests that she is safety-valve eligible and is not a flight risk. After her arrest for the instant offense and after she was placed on pretrial release, Ms. Watford became the victim of a violent crime which necessitated her working closely with Federal Pretrial Services in order to assure compliance with conditions of release under unusual circumstances. On information and belief, Ms. Watford has passed all drug tests, obtained and maintained employment and has complied with all requests of pretrial services. On information and belief, Ms. Watford's mother plans to appear in court to support a change in conditions of release and to offer her personal bond, if required.

Apparently, Ms. Watford has been accepted for employment as a private duty nurse which would begin immediately, but requires flexible hours. The name of Ms. Watford's prospective

employer and the name of the school in which she would like to enroll have both been supplied to the prosecutor and to pretrial services.

RESPECTFULLY,
NAOMI WATFORD, By Her Attorney,

s/ Myles Jacobson

Date: May 18, 2006

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